

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Review of Part 15 and other Parts)	ET Docket No. 01-278
of the Commission's Rules)	RM-9375
)	RM-10051

To: The Commission

COMMENTS OF JOHN DOUGLAS LAMB
IN RESPONSE TO NOTICE OF PROPOSED RULE MAKING

As an Amateur Radio operator, I must strongly voice my opposition to the radical changes proposed by the Commission in regards to Part 15 rules governing unlicensed, periodic, intentional radiators so as to permit increased duty cycles and permitted field strengths for radio frequency identification (RFID) systems.

SAVI Technology's devices are deliberately configured to operate at 420-450 MHz, at field strengths of 110 mV/m, with duty cycles up to two minutes at a time, and with only a ten-second silent period between transmissions. Current FCC regulations permit field strengths of this magnitude, but only for duty cycles of less than one second and of at least 30 times the duration of the transmission.

If these and similar devices are allowed to transmit for periods of time longer than the current limit of one second, the potential for interference to Amateur Radio stations would increase exponentially. When SAVI conducted a voluntary demonstration of its device at an Amateur Radio operator's residence recently, it showed significant interference potential.

There is no reason whatsoever that requires the use of this frequency by SAVI, except as a cost benefit for them, as RF equipment in this frequency range is cheap and readily available.

Since its inception, Amateur Radio has been a professional, courteous, and cooperative group. Its service to community, state, and country is and always has been unmatched by any other volunteer organization. The simple enjoyment of creating friendships and sharing common bonds with others around the world has truly made the world a smaller place.

Yet, we are once again being pushed aside as though we were step-children, as more of our currently over-crowded bandwidth is being jeopardized. We are a compliant, voluntary, hobbyist organization. SAVI is a for-profit company. They can afford to develop their product using a different frequency. We cannot afford to lose any more.

I urge you to reject this proposal, and thank you for your time.

Best Regards,

John Douglas Lamb
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